

AMEND LPFM to ("MPFM")

FCC ADVISORY COMMITTEE ON DIVERSITY FOR
COMMUNICATIONS IN THE DIGITAL AGE

SUBCOMMITTEE ON NEW TECHNOLOGIES

RECOMMENDATION FOR FCC CONSIDERATION OF
NINE MEANS OF DIVERSIFYING OWNERSHIP IN THE
COMMERCIAL FM RADIO BAND (92.1 - 107.9 MHz)

Draft #8, 6/11/04

Nine Initiatives Recommended for Rulemaking

Here are nine examples of spectrum-efficiency initiatives that might be likely to benefit minority media owners and entrepreneurs.

We note that an additional recently-proposed initiative is intended to streamline the procedures governing modifications of FM and AM authorizations. Petition for Rulemaking of First Broadcasting Investment Partners LLC, (filed March 5, 2004 and assigned MB Docket 04-41). The comment period has not yet been completed; thus, we will study this matter in the coming months. As noted above, we emphasize that these initiatives are aimed at promoting the efficient and thorough use of the spectrum resource, and are not intended to lead to any material degradation of the quality of FM service to the consumer.

Create Medium Power FM Stations

A relatively easy first step toward efficient spectrum utilization would be the creation of new classes of FM stations. By way of illustration, two new classes of stations, to be known as "Medium Power FM" ("MPFM") could be created as follows:

Class A1: 1,500 watts at 100 meters HAAT

Class A2: 1,000 watts at 50 meters HAAT

These stations would be considerably less powerful than a Class A facility. MPFM stations would principally be designed for communities where even a Class A facility is not necessary to serve the entire public, or for niche service to neighborhoods in large metro